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Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

MATTHEW ROUILLARD and KRISTY
MUNDEN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

SAG-AFTRA HEALTH PLAN,

Defendant.

Case No. 2:24-CV-10503-MEMF-JPR

Assigned for All Purposes to:
Courtroom 8B; Hon. Maame Ewusi-Mensah
Frimpong

**PLAINTIFFS' JOINT NOTICE OF
MOTION AND MOTION TO
CONSOLIDATE RELATED ACTIONS
AND APPOINT INTERIM CLASS
COUNSEL**

Hearing Information:

Date: February 13, 2025

Time: 10:00 a.m.

Courtroom: 8B

Complaint Filed: December 5, 2024

LEE WILKOF, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SAG-AFTRA HEALTH PLAN,

Defendant.

Case No. 2:24-CV-10626-WLH-PD

Assigned for All Purposes to:
Courtroom 9B; Hon. Wesley L. Hsu

Complaint Filed: December 10, 2024

STEVEN BARR, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SAG-AFTRA HEALTH PLAN,

Defendant.

Case No. 2:24-CV-10462-SVW-BFM

Assigned for All Purposes to:
Courtroom 10A; Hon. Stephen V. Wilson

Complaint Filed: December 10, 2024

MASSIMILIANO FURLAN, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SAG-AFTRA HEALTH PLAN,

Defendant.

Case No. 2-24-CV-10791-MRA-JC

Assigned for All Purposes to:
Courtroom 10B; Hon. Mónica Ramírez
Almadani

Complaint Filed: December 13, 2024

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the Plaintiffs in four related cases (“**Plaintiffs**”) *Rouillard, et al. v. SAG-AFTRA Health Plan*, Case No. 2:24-cv-10503-MEMF-JPR (“**Rouillard**”); *Wilkof v. SAG-AFTRA Health Plan*, Case No. 2:24-cv-10626-WLH-PD (“**Wilkof**”); *Barr v. SAG-AFTRA Health Plan*, Case No. 2:24-cv-10642-SVW-BFM (“**Barr**”); and *Furlan v. SAG-AFTRA Health Plan*, Case No. 2:24-cv-10791-MRA-JC (“**Furlan**”) (collectively the “**Related Cases**”), will and hereby do move this Court for an Order consolidating the Related Cases and appointing Interim Co-Lead Counsel and Interim Executive Committee Chair (collectively “**Proposed Interim Class Counsel**”) to oversee the consolidated action pursuant to Fed. R. Civ. P. 23(g) and 42(a). This Motion will be heard on **February 13, 2025, at 10:00 a.m.**, in the courtroom of the Honorable Maame Ewusi-Mensah Frimpong, located at the United States Courthouse, 350 West First Street, Los Angeles, CA, 90012, Courtroom 8B, 8th Floor.

The Related Cases involve common issues of law and fact. All four Related Cases assert similar claims arising from a Data Breach (the “**Data Breach**”), which lead to disclosure of Plaintiffs’ and the class’s sensitive personal information in September of 2024. Plaintiffs in the Related Cases have filed similar Class Action Complaints against the Defendant relating to the data breach and seek similar relief. Accordingly, these four Related Cases should be consolidated for all purposes pursuant to Fed. R. Civ. P. 42(a).

Under Fed. R. Civ. P. 23(g)(3), “[t]he court may designate interim counsel to act on behalf of a putative class before determining whether to certify the action as a class action.” In so appointing, the Court may consider factors relating to the prospective counsel’s reputation and skills. *See* Fed. R. Civ. P. 23(g)(1). Here, pursuant to FRCP Rule 23(g), the undersigned attorneys for the Plaintiffs putative class actions respectfully jointly request that the Court appoint Proposed Interim Co-Lead Counsel John J. Nelson, of Milberg Coleman Bryson Phillips Grossman PLLC, Gregory Haroutunian, of Clayco C. Arnold, A Professional Corporation, and Yana Hart of Clarkson Law Firm, P.C.; and Executive Committee Chair, James F. Clapp of Clapp & Lauinger,

LLP. This Motion is based upon the memorandum of points and authorities filed herewith, the declarations of counsel in support of the Motion and any other such evidence and argument that may be presented to the Court prior to its ruling on the Motion.

Plaintiffs' counsel conferred with Defendant's counsel pursuant to Local Rule 7-3. *See* Haroutunian Decl. ¶ 7.

Respectfully submitted,

Dated: January 2, 2025

CLARKSON LAW FIRM, P.C.

By: /s/ Yana Hart

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